

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	
SECURITIES AND EXCHANGE COMMISSION,	:
	:
Plaintiff,	:
	:
v.	:
	:
TELEGRAM GROUP INC. and TON ISSUER INC.,	:
	:
Defendants.	:
-----X	

19 Civ. 09439 (PKC)

**THE TON COMMUNITY FOUNDATION’S MOTION
FOR LEAVE TO FILE CORRECTED *AMICUS CURIAE* BRIEF**

The Ton Community Foundation (the “Foundation”), by and through its undersigned counsel, respectfully moves for leave to file a corrected version of its *amicus curiae* brief (the “Amicus Brief”). The grounds for this motion are as follows:

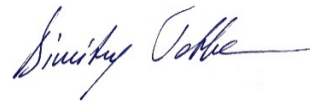
1. On February 14, 2020, the Foundation filed a motion for leave to file its Amicus Brief in the above-captioned matter (ECF 192), and attached a copy of the proposed brief as an exhibit thereto (ECF 192-1).

2. The proposed Amicus Brief contains a number of typographical errors. In order to correct these errors, the Foundation has prepared a corrected version of its Amicus Brief, which is attached as Exhibit A hereto. A true and correct copy of a blacklined version of the corrected brief showing changes from the February 14, 2020 version is attached as Exhibit B hereto.

For the foregoing reasons, the Foundation respectfully requests leave to file the corrected Amicus Brief. The granting of this motion would not prejudice any party.

February 17, 2020

Respectfully Submitted,

A handwritten signature in dark ink, appearing to read "Dmitry Joffe", with a long horizontal flourish extending to the right.

Dimitry Joffe (DJ-6498)
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*Counsel to Amicus Curiae
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CERTIFICATE OF SERVICE

I, Dimitry Joffe, hereby certify that on this 17th day of February 2020, I caused a copy of motion for leave to file a corrected version of the *Amicus Curiae* Brief by the TON Community Foundation to be served upon the registered participants in this case by ECF.

A handwritten signature in blue ink, reading "Dimitry Joffe", with a long horizontal flourish extending to the right.

Dimitry Joffe
JOFFE LAW P.C.
*Counsel to Amicus Curiae
the TON Community Foundation*